

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

MICHAEL GRASSI, <i>et al.</i> ,	)	Case No. 1:18-CV-2619-PAB
	)	
	)	Judge Pamela A. Barker
Plaintiffs,	)	
	)	
v.	)	
	)	
JOHN GRASSI, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**PROPOSED JOINT PRELIMINARY STATEMENT**

Pursuant to the Court’s Civil Trial Order dated June 3, 2022 (ECF Doc. 137), Plaintiffs Michael Grassi and CFOM, Inc. (“Plaintiffs”) and Defendants John Grassi and Alotech Limited LLC (“Defendants”) submit this proposed joint preliminary statement to the Court.

\* \* \*

## **Proposed Joint Preliminary Statement**

This case arises out of a dispute between two brothers, John Grassi and Michael Grassi, and their respective companies. You will often hear them referred to during this trial by their first names, Mike and John, so that you can understand who the witnesses and lawyers are talking about. Even though these parties are brothers, the same legal principles and rules apply to them and their companies and the claims they are making in this case, just as they would apply to any other business parties with a legal dispute.

John Grassi is the president and sole owner of Alotech, a company involved in a process called ablation casting. Alotech uses this proprietary ablation process to create specialty alloy castings for the automobile and automotive industry, and then licenses the process for further production of those specialty castings. Alotech has licensed this technology to a number of companies, including Honda. Alotech receives license royalties and other compensation from its licensees, including Honda.

Michael Grassi is the sole owner of CFOM, Inc., a company that engages in research and development and manufacturing of mass flow controllers, and process technology for ablation and other industries. John and Michael worked together previously, but the parties dispute the length and nature of their engagement. It is undisputed that the parties stopped working together in 2017.

This lawsuit centers on two disagreements between the parties. First, there is a dispute between the parties about whether Alotech misappropriated certain trade secrets allegedly belonging to CFOM or Michael Grassi related to the ablation process, or whether that technology belongs to Alotech. Second, there is a disagreement between the parties about whether there was an agreement between the parties by which 35% of the proceeds paid to Alotech from Honda for licensing ablation technology would be paid to Michael's company, CFOM.

November 28, 2022

Respectfully submitted,

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